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085486B

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

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CASE NO. 16-23275-MBK

In re:

:

Hudson Saintyl CERTIFICATION OF COUNSEL

IN SUPPORT OF CONSENT ORDER

**DEBTOR** :

- 1. I am an attorney, licensed to practice law in the State of New Jersey, am a Member of the law firm of Pluese, Becker & Saltzman, LLC and am responsible for the representation of and authorized to make this Certification on behalf of the Secured Creditor/First Mortgagee, Ditech Financial LLC f/k/a Green Tree Servicing LLC servicer of the Mortgagee, The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for The Certificateholders CWABS, Inc., Asset-Backed Certificates, Series 2007-12 (collectively, the "Mortgagee") in the above-captioned matter. I make this Certification of my own personal knowledge and predicated upon matters of record as reflected by documents contained in our firm's file.
- 2. Debtor proposes to surrender the property located at 59 Bergen Mills Road, Monroe, NJ 08831.

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3. Debtor, by and through Counsel, has agreed to allow the Mortgagee relief from the Automatic Stay.

4. Accordingly, the Mortgagee on behalf of both Parties, respectfully requests that the annexed proposed

form of Consent Order to be entered, memorializing the Parties' agreement for relief from the Automatic

Stay.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge,

information, and belief. I am aware that if any of the foregoing statements are wilfully false, I am subject

to punishment.

Respectfully Submitted,

Pluese, Becker & Saltzman, LLC

By: /s/ Rob Saltzman

Rob Saltzman

Attorneys for Ditech Financial LLC

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2C

Rob Saltzman, Esquire Pluese, Becker & Saltzman, LLC RS1765 20000 Horizon Way, Suite 900 Mount Laurel, NJ 08054-4318 (856) 813-1700 Attorneys' for the Mortgagee File No. 085486B

In Re:

**Hudson Saintyl** 

Case No.: 16-23275-MBK

Hearing Date: N/A

Judge: Michael B. Kaplan

## CONSENT ORDER VACATING THE AUTOMATIC STAY AS TO REAL PROPERTY

The relief set forth on the following pages, numbered two (2) through (3) is hereby **ORDERED.** 

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Page 2

Debtor: Hudson Saintyl Case No: 16-23275-MBK

Caption of Order: Consent Order Vacating the Automatic Stay as to Real Property

This matter having come before the Court on the Application of Ditech Financial LLC f/k/a Green Tree Servicing LLC servicer of the Mortgagee, The Bank of New York Mellon f/k/a The Bank of New York, as Trustee for The Certificateholders CWABS, Inc., Asset-Backed Certificates, Series 2007-12 (collectively, the "Mortgagee"), Mortgagee, by and through counsel, Pluese, Becker & Saltzman, LLC, Rob Saltzman, Esquire, appearing and the Debtor, by and through counsel, Laurence R. Sheller, Esquire, having consented hereto and good cause having been shown; IT is hereby, ORDERED as follows:

- 1. The automatic stay of Bankruptcy Code section 362(a) is vacated to permit the Movant to institute or resume and prosecute to conclusion one or more action(s) in the court(s) of appropriate jurisdiction to foreclose mortgage(s) held by the Movant upon the following:
  - 2. This Order shall be immediately effective as to the property located:
    - ✓ 59 Bergen Mills Road Monroe, NJ 08831
- 3. The Movant may, but need not join the Debtor and any Trustee appointed in this case as defendants in its foreclosure action(s) irrespective of any conversion to any other chapter of the Bankruptcy Code.
- 4. The Movant shall serve this order on the Debtor, any Trustee and other party who entered an appearance on the motion.

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Page 3

Debtor: Hudson Saintyl Case No: 16-23275-MBK

Caption of Order: Consent Order Vacating the Automatic Stay as to Real Property

We hereby consent to the form and entry of the within Order.

PLUESE, BECKER & SALTZMAN, LLC LAURENCE R. SHELLER

By: /s/ Rob Saltzman By: /s/ Laurence R. Sheller

Rob Saltzman, Esquire

Attorneys for the Mortgagee

Laurence R. Sheller, Esquire

Attorney for the Debtor